

STATEMENT OF BASIS (AI No. 31214)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0100625 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Kencoil, Inc.
2805 Engineers Road
Belle Chasse, LA 70037

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Kelli Hamilton

DATE PREPARED: October 19, 2009

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permit - LPDES permit effective date: September 1, 2004
LPDES permit expiration date: August 31, 2009
EPA has not retained enforcement authority.

C. Date Application Received: July 9, 2009; revised application received October 14, 2009; additional information received 10/22/09

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - electric motor manufacture and repair facility

Operations at this existing facility are the shaping of copper wire into electric motor coils, dipping such coils in an enamel bath, and baking same in an industrial oven until cured. There is no cooling water used, and all solutions are consumed in the process. Additionally, the repair of electric motors involves a steam wash process, in which washwater is produced. Treated sanitary wastewater is the only other discharge.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: III
3. Wastewater Type: II
4. SIC code: 3621

C. LOCATION - 2805 Engineers Road in Belle Chasse, Plaquemines Parish
Latitude 29°50'59", Longitude 90°01'40"

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3. OUTFALL INFORMATION

Outfall 001

Discharge Type: washwater, and treated sanitary wastewater
Treatment: oil/water separator, mechanical treatment units;
Location: at the point of discharge from the effluent pipe located closer to the Scott Armature building
Flow: 2760 gpd
Discharge Route: unnamed ditch, thence into Concord Canal, thence into Bayou Barataria

Outfall 002

Discharge Type: treated sanitary wastewater
Treatment: mechanical treatment unit
Location: at the point of discharge from the effluent pipe located closer to the Administration building
Flow: 1920 gpd
Discharge Route: unnamed ditch, thence into Concord Canal, thence into Bayou Barataria

4. RECEIVING WATERS

STREAM - unnamed ditch, thence into Concord Canal, thence into Bayou Barataria

BASIN AND SEGMENT - The discharge is into an unnamed ditch, which is physically located in subsegment 020601 of the Barataria Basin, defined at LAC 33:IX.1123.Table 3 as Intracoastal Waterway -From Bayou Villars to Mississippi River (Estuarine). However, the discharge from Kencoil, Inc. does not flow into these defined waterbodies, rather into subsegment 020802, defined at LAC 33:IX.1123.Table 3 as Bayou Barataria and Barataria Waterway-From ICWW to Bayou Rigolettes (Estuarine). Therefore, for the purposes of issuing this permit, subsegment 020802 will be used in the development of requirements.

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 020802, Bayou Barataria and Barataria Waterway-From ICWW to Bayou Rigolettes (Estuarine), is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDLs have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

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6. CHANGES FROM PREVIOUS PERMIT

The previous permit had interim limits for Outfall 001 (treated sanitary wastewater, electric motor washwater, and stormwater runoff) and Outfall 002 (treated sanitary wastewater and stormwater runoff). It also had Final limits for Outfall 001 (stormwater), Outfall 002 (stormwater) and Outfall 003 (treated sanitary wastewater and electric motor washwater). Outfall 003 was deemed cost prohibitive, and never built. The facility submitted a No Exposure Certification, so stormwater will not be covered. Therefore, this permit will have Outfall 001 (washwater, and treated sanitary wastewater) and Outfall 002 (treated sanitary wastewater) as final limits, not interim.

Monthly Average Limitations have been added to Outfalls 001 and 002. Weekly Average Limitations for Outfalls 001 and 002 have been changed to Daily Maximum Limitations.

The subsegment has been changed from 020601 to 020802. See # 4 on page 2 for further explanation.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

No records of recent compliance actions were found.

B. DMR Review/Excursions - A DMR review was completed for June 2007 through June 2009. The excursions are as follows:

DATE	PARAMETER	OUTFALL	REPORTED VALUE		PERMIT LIMITS	
			MONTHLY AVERAGE	WEEKLY AVERAGE	MONTHLY AVERAGE	WEEKLY AVERAGE
1/08	TSS	001	46.5	81	---	45
	TSS	002	47.5	84	---	45

8. EXISTING EFFLUENT LIMITS

Outfalls 001 & 002

Oil & Grease -:15 mg/l
TOC -:50 mg/l
pH 6-9 s.u.

Outfall 003

Oil & Grease -:15 mg/l
BOD -:45 mg/l
TSS -:45 mg/l
Fecal Coliform -:400 colonies/ml
pH 6-9 s.u.

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9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020802 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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13. STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2511.A.1, storm water shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 3621 are considered to have storm water discharges associated with industrial activity. However, a No Exposure Certification was submitted on October 14, 2009. Therefore, an SWP3 is not required.

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Rationale for Kencoil, Inc.

1. Outfall 001 washwater, and treated sanitary wastewater (estimated flow is 2760 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow	---:Report	LAC33.IX.2707.I.1.b
BOD ₅	30:45	See limits justification (1), (2) below
TSS	30:45	40 CFR 438; See limits justification (1), (2) below
Fecal Coliform (colonies/100 ml)	200:400	See limits justification (1), (2) below
Oil & Grease	---:15	40 CFR 438; BPJ previous permit
pH (su)	6.0 - 9.0 (min) (max)	40 CFR 438; See limits justification (2) below

Treatment: oil/water separator, mechanical treatment units

Monitoring Frequency: once per two months

Limits Justification:

- 1) Sanitary wastewater regulated in accordance with LAC 33:IX.711 or LAC 33:IX.709.B - Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD₅ and TSS in terms of concentration.
- 2) BPJ utilizing the LPDES Class I Sanitary General Permit and previous permit.

Discharges of washwater are permitted with a TOC limit of 50 mg/L. The discharge of washwater from the oil/water separator is mixed with the discharge of the treated sanitary wastewater prior to discharge from Outfall 001. Since it is not possible under the existing configuration to sample the washwater independently from the treated sanitary wastewater, a TOC limit is not placed on this outfall. The BOD₅ limit (based on the Class I Sanitary Permit) placed on this outfall is sufficient to limit the total discharge of organic carbon.

EFFLUENT LIMITATIONS GUIDELINES - ELGs

This facility is subject to Best Practicable Control Technology Currently Available (BPT), and Best Conventional Pollutant Control Technology (BCT) effluent limitation guidelines (ELGs) for the Metal Products and Machinery (MG&M) Point Source Category, 40 CFR 438:

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<u>Parameter</u>	<u>Maximum Daily Limit</u>
TSS	62 mg/L
Oil & Grease	46 mg/L
pH	(min:max) 6 su:9 su at all times

Site-Specific BPJ Considerations

LDEQ's implementing guidance, in consideration of anti-backsliding provisions of the Clean Water Act, specifies that if a pollutant is covered under both the existing permit and the MP&M ELGs, the more stringent of the two applies. If the existing permit covers a pollutant that is not covered by the MP&M ELGs, the pollutant limit may be removed unless a DMR excursion has been reported, in which case the existing permit limit is retained. The MP&M ELGs are discussed below for TSS and Oil & Grease. The ELG pH limit is incorporated in the permit.

TSS - the daily maximum limits from the MP&M effluent guidelines are less stringent than the site-specific BPJ daily maximum limits established in the 1994 LWDPS permit. Therefore, concentration limit for TSS of 45 mg/L daily maximum is retained from the previous permit.

Oil & Grease - the daily maximum limits from the MP&M effluent guidelines are less stringent than the site-specific BPJ daily maximum limits established in the 1994 LWDPS permit. Therefore, concentration limit for Oil & Grease of 15 mg/L daily maximum is retained from the previous permit.

2. Outfall 002: treated sanitary wastewater (estimated flow is 1920 gpd)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow (MGD)	---:Report	LAC 33:IX.2707.I.1.b
BOD ₅	30:45	See limits justification (1),(2) below
TSS	30:45	See limits justification (1),(2) below
Fecal Coliform (colonies/100 ml)	200:400	See limits justification (1),(2) below
pH (su)	6.0 - 9.0 (min) (max)	See limits justification (2) below

Treatment: mechanical treatment unit

Monitoring Frequency: once per two months

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Limits Justification:

- 1) Sanitary wastewater regulated in accordance with LAC 33:IX.711 or LAC 33:IX.709.B - Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which expresses BOD₅ and TSS in terms of concentration.
- 2) BPJ utilizing the LPDES Class I Sanitary General Permit and previous permit.

* Existing permits for similar outfalls
BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.